**UNITED STATES BANKRUPTCY COURT**
**DISTRICT OF SOUTH CAROLINA**

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| In re:<br><br>Industrie Service, LLC,<br><br>Debtor. | Case No. 17-02995-hb<br><br>Chapter 11 |

**ADDENDUM TO PLAN OF REORGANIZATION**
**FILED BY THE DEBTOR ON NOVEMBER 30, 2018**

Industrie Service, LLC ("Debtor") hereby amends and supplements its Plan of Reorganization ("Plan"), which was filed on November 30, 2017, to provide as follows:

1. The Plan at Article III "Plan of Reorganization" are hereby supplemented and amended to provide as follows:

a. Throughout the term of this Plan, current administration of the Debtor shall remain in place as the Debtor's management at the same austere compensation structure as agreed upon with the Debtor post-petition. Debtor's management does not receive direct compensation for their involvement with Fabrication Mechanical Service, LLC ("FMS"), instead FMS pays the Debtor a flat monthly fee for management services in the amount of $5,000 and these funds are expended as detailed in the feasibility budget attached to the Addendum to Debtor's Disclosure Statement as Exhibit 1.

b. As detailed on the Feasibility Budget attached to the Addendum to Debtor's Disclosure Statement as Exhibit 1, HansJurgen Blum, the sole member, is making monthly contributions to support the Debtor's Plan. Trust fund assessments have been made against HansJurgen and Clarissa Blum, parties who are insiders that are essential to the Debtor's management. Application of payments pursuant to this Plan to the trust fund taxes will further motivate them to work towards the successful reorganization of the Debtor. The requested payment application to the Debtor's IRS trust fund taxes is thus necessary to the successful reorganization of the Debtor.

c. Twenty percent (20%) of the membership interest in the Debtor shall be divided into a creditors trust for the benefit of claimants in Class 5, Class 6, Class 7, and Class 8. Costs of the Trust, if any, will be borne by members of the Trust. A sample Trust Agreement is attached as Exhibit 2 to the Addendum to the Debtor's Disclosure Statement, which may be modified as agreed upon by the members of the Trust.

2. The Debtor's Plan at Article III "Plan Classifications" is hereby supplemented and amended to provide as follows:

a. Class 1 is amended to reflect that the federal tax liens issued by the IRS will be retained following confirmation of the Debtor's Plan. Class 1 is further amended to reflect the filing of Proof of Claim ("POC") 3-6 filed by the IRS subsequent to the filing of the Debtor's initial Plan and Disclosure Statement on November 30, 2017. Class 1 shall receive payments over a 120-month term until such time as the IRS secured claim has been paid in full. Payments to Class 1 shall begin on the fifty-first month in initial monthly installments of $12,879.20. Beginning on the sixty-first month of the Plan payments on Class 1 shall be in the monthly amount of $21,377.99 and shall continue for the final sixty months of the Debtor's Plan.

b. Class 2 is hereby amended to reflect POC 3-6 filed by the IRS and showing a priority claim in the amount of $775,966.87. Post-petition but prior to confirmation, the Debtor has made $150,000.00 in adequate protection payments to the IRS. In order to address this increase, the $150,000.00 in adequate protection payments shall be treated as payments on the priority component of POC 3-6. For the first twenty-four months of this Plan, Class 2 will receive distributions in the amount of $15,551.66, which shall be divided pro rata between the Allowed Claims of Class 2 creditors. Beginning in the twenty-fifth month after the Effective Date, Class 2 will receive distributions in the amount of $23,177.36, which shall be divided pro rata between the Allowed Claims of Class 2 creditors. The Debtor projects that all Allowed Claims of Class 2 creditors shall be paid within sixty months of the Petition Date. To the extent that claims in Class 2 are reduced through application of the claims objection process, then any reduction to non-IRS priority claims shall be paid to the IRS and considered payment

towards the IRS priority claim for Plan purposes, thus reducing the amount of the $150,000 in adequate protection payments treated as payment of the priority tax claims as described above.

c. Class 6 is hereby amended and supplemented to reflect that the Allowed Claims held by members of Class 6 will receive no less than ten percent (10%) of their claims. Additionally the holders of Allowed Claims in Class 6 shall be entitled to a participation in the Creditors Trust. For the initial twenty-four months following the Effective Date, Class 6 shall receive distributions in the amount of $2,391.14, which shall be paid pro rata to the holders of Allowed Claims of Class 6 creditors. For the next twenty-seven months, Class 6 shall receive distributions in the amount of $1,017.43, which shall be paid pro rata to the holders of Allowed Claims of Class 6 creditors. During the final nine months of the Plan, Class 6 shall receive distributions in the amount of $11,315.60, which shall be paid pro rata to the holders of Allowed Claims of Class 6 creditors.

d. Class 9 is hereby amended and supplemented to reflect that upon the Effective Date all Class 9 claims shall be extinguished and forever barred from collection against the Debtor.

3. The Plan at Article IV "Feasibility of Proposed Plan and Means of Effectuation" is hereby supplemented and amended to state that unless otherwise specifically provided in this Plan or allowed by order of the Bankruptcy Court, the Debtor will not be required to pay to any holder of a Claim any interest, penalty or late charge accruing with respect to such claim on or after the Petition Date.

Respectfully submitted, this the 1st day of February 2018,

McCARTHY, REYNOLDS, & PENN, LLC

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